

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, *et al.*,

Plaintiffs,

v.

CHRISTOPHER J. CHRISTIE, Governor of
the State of New Jersey, *et al.*,

Defendants.

**NOTICE OF PRO PUBLICA,
LLC'S MOTION TO INTERVENE
AND UNSEAL**

Civil Action No. 12-cv-4947

Hon. Michael A. Shipp, U.S.D.J.

Hon. Lois H. Goodman, U.S.M.J.

Motion Day: June 6, 2022

PLEASE TAKE NOTICE that Pro Publica, LLC ("ProPublica") will move before the Honorable Judge Goodman, U.S.M.J., on June 6, 2022, or as soon thereafter as counsel may be heard, for an Order that (1) permits ProPublica to intervene in this matter for the limited purpose of seeking access to court records, and (2) unseals all court records in this matter that remain under seal either in whole or in part, through redactions.

In support of this motion, ProPublica relies on the attached brief and proposed form of order.

/s/ Bruce S. Rosen
Pashman Stein Walder
Hayden, P.C.
Court Plaza South
21 Main Street, Suite 200

Hackensack, NJ 07601
T: (201) 488-4878
F: (201) 488-5556
brosen@pashmanstein.com

Dated: April 28, 2022